IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CONSUELO LIMON, PLAINTIFF, v. CITY OF JOLIET, et. al., DEFENDANTS.	Case No: 15-cv-01989 Judge: Lefkow

AGREED MOTION TO EXTEND TIME TO COMPLETE FACT DISCOVERY

NOW COME the parties, by and through their respective counsel, and ask this Honorable Court to extend the time to complete fact discovery. In support of this motion, the parties state:

1. The current discovery cutoff for this case is May 30, 2016.

2. The parties have completed F.R.C.P. 26(a) disclosures and have exchanged Interrogatories and Requests for Production and responses thereto.

3. The parties have not, however, been able to complete depositions and do not anticipate being able to complete depositions by May 30, 2016.

4. As this case involves voluminous medical records from multiple healthcare providers, Defendants issued multiple subpoenas in March of 2016.

5. Defendants and Plaintiff agreed to postpone Plaintiff's deposition until the medical records were received.

6. Plaintiff's deposition will occur on May 13, 2016.

7. Defendants and Plaintiff agreed to postpone Defendants' and witnesses' depositions until after Plaintiff's deposition. The parties anticipate three Defendant depositions and three witness depositions.

8. Two Defendants will be deposed on May 16, 2016. One witness will be deposed on May 20, 2016.

9. One witness is currently incarcerated and will have to be deposed in jail. The parties are in the process of scheduling that deposition with the jail.

10. In addition, Defendants will depose one or more medical professionals from whom Plaintiff has sought treatment. The timing of those depositions is contingent upon the scheduling of the medical professionals.

11. The parties have been in frequent contact regarding scheduling and anticipate that depositions will be completed by July 31, 2016.

12. In the Proposed Scheduling Order filed on July 22, 2015, the parties stated that any experts under F.R.C.P. 26(a)(2) would be disclosed by Plaintiff by June 30, 2016 and by Defendants by July 31, 2016. The parties would have twenty-one (21) days thereafter to depose the designated experts.

13. The parties do not anticipate retained experts for which a report is required under F.R.C.P. 26(a)(2)(B), but should either party wish to retain an expert for which a report is required under F.R.C.P. 26(a)(2)(B), that party will file a Motion to Set Expert Discovery Schedule with this Court by July 15, 2016.

WHEREFORE, for the reasons discussed herein, the parties respectfully request that this Honorable Court extend the time for the completion of fact discovery until July 31, 2016.

Respectfully submitted,

/s/ Kara Amouyal
Kara Amouyal, Esq.

Blake W. Horwitz, Esq.
Kara Amouyal, Esq.
The Blake Horwitz Law Firm, Ltd.
111 W. Washington, Suite 1611
Chicago, Illinois 60602
Telephone: (312) 676-2100
Facsimile: (312) 445-8741